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APR 28 2016

AWPD/APCO

April 27, 2016

Via Federal Express

Mr. Jon Knodel
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Re: Nebraska Public Power District- Second Response to March 25, 2016 CAA Section 114
Information Request

Dear Jon:

Enclosed is the Second Response of NPPD to EPA's March 25, 2016 Section 114 Information
Request. The Second Response includes a short paper document and one CD.

Sincerely,

Stinson Leonard Street LLP

A handwritten signature in dark ink, appearing to read "Parthy Evans", written over the printed name.

Parthenia B. Evans

PBE:lmc

Enclosures

cc: Sarah Hertz Wu, Esq.

SECOND RESPONSE OF THE NEBRASKA PUBLIC POWER DISTRICT

to United States Environmental Agency Region 7 March 25, 2016

Request for Information Pursuant to Section 114(a) of the Clean Air Act

Submitted April 27, 2016

This is the Second Response of Nebraska Public Power District (NPPD) to the EPA Region 7 March 25, 2016 Request for Information under section 114 (a) of the federal Clean Air Act, 42 U.S.C. § 7414(a) ("Information Request"). Pursuant to March 8, 2016 correspondence from NPPD legal counsel to EPA Region 7 proposing a schedule for provision of documents and to Region 7 EPA April 13, 2016 reply correspondence, NPPD will provide documents in response to the Information Request in three parts on April 15, April 27, and May 6 and may find it necessary to supplement those responses if time delays are encountered delaying review of paper documents. The station outage and associated time constraints have prevented completing collection of question 4 and 5 documents for this Second Response. NPPD will complete the submittal of questions 4 and 5 documents on May 6.

Enclosed is a CD labeled "NPPD 4-27-16 Second Response to EPA 3-15-16 CAA 114 Information Request: Disc 1 of 1." As requested in Enclosure 1 of the request, non-spreadsheet documents being produced with this submission have been provided in pdf format and each document contains language identifying the question number to which it corresponds. Per Instruction number 5, spreadsheet documents have been produced in native Excel form. All of the spreadsheet documents included in this production correspond to Question 4 of the request. Because these files are being produced in native, they cannot be branded with language identifying the question number to which they correspond. The contents of the CD are password-protected. You will receive a password to access the CD via email. .

Please note that some documents may be responsive to more than one question. It is NPPD's intent to Bates label and provide a particular document once with an effort to link the document with the question to which it appears most responsive based NPPD's understandings and interpretations of the questions. Also, please note that NPPD's response does not include draft or preliminary (i.e., non-final) versions of provided documents because drafts may not contain accurate or comprehensive details and information.

NPPD has attempted to protect from disclosure all "attorney/client" or "attorney work product" privileged documents. If NPPD inadvertently produced a privileged document please do not review it and promptly notify Mr. Harold Hadland by using the email address provided below.

Nothing in this Second Response, or the corresponding information and documents, is to be used or construed as an admission of liability, and this Second Response and the information and documents provided should be read in conjunction with NPPD's complete response to the Information Request.

Pursuant to the federal Freedom of Information Act, 5 U.S.C. sections 301, 552, NPPD is entitled to have its trade secrets and commercial and financial information exempt from disclosure by EPA to any person. EPA implementing regulations at 40 C.F.R Part 2, Subpart B – Confidentiality of Business Information implement the Freedom of Information Act as to programs administered by EPA. In accordance with NPPD's rights under the Freedom of Information Act and the procedures in EPA's implementing regulations, NPPD may designate a number of documents or pages of documents provided in its responses to the Information Request as confidential business information and will appropriately mark such information as "Confidential Business Information."

Certain questions may be interpreted to essentially call for additional calculations and/or the creation of new documents. NPPD objects to the Information Request to the extent it calls for such calculations or creation of documents. NPPD has not generated and produced any new data, calculations, information or documentation solely for the purpose of responding to the Information Request if it did not already exist in that form prior to March 25, 2016 unless NPPD has determined generation of the same to be the most efficient manner in which to respond to a question. If information or documents are generated for its response, NPPD does not waive its above objection.

Enclosure 1 to the Information Request provides some definitions for terms used in the Information Request and directs that terms have their ordinary meaning unless defined in the CAA, in 40 CFR Part 52 (which incorporates the federally approved State Implementation Plan), or in other CAA implementing regulations. Some of the terms in the Information Request may be vague and/or susceptible to varying interpretations. NPPD is providing documents consistent with its reasonable understanding of such terms.

The Information Request Enclosure 1 Definitions and Instructions seek to impose obligations on NPPD as an information request recipient. NPPD objects to the obligation or to the characterization of the obligation to the extent that the obligation or its characterization may be beyond EPA's statutory authority. At this time, NPPD objects to Definition number 4 and Instruction number 8 to the extent that they seek to obligate NPPD to seek out responsive documents not within NPPD's possession or control. NPPD reserves the right to raise these and other objections at any time. NPPD is attempting to be overly inclusive in its responses to the Information Request. This over-inclusion of documents is not an admission or waiver of NPPD's position that the information and documents provided may not be required by law to be provided.

NPPD reserves the right to object on any grounds to any and all parts of the Information Request, including any supplements thereto or additional information requests in the future, and nothing contained herein should be construed as a waiver of any objection that NPPD may have related to the Information Request or any supplements thereto or additional information requests.

If EPA believes any of the information provided by NPPD is not responsive or is inconsistent with the intent of the Information Request, please contact Harold L. Hadland, Esq., Senior Staff Attorney, Nebraska Public Power District, 1414 15th Street, Columbus, Nebraska, 68602-0499, (402) 563-5046, hlhadla@nppd.com, for clarification. Furthermore, NPPD employees referenced in this First Response, as well as any other NPPD employee, should be contacted only

through Mr. Hadland as indicated above. NPPD's final response will include the Statement of Certification requested.

Below the Information Request questions are stated followed by reference to documents in response to the questions.

1. For the Gerald Gentleman Station Units 1 and 2, provide all documents as described below from March 2011 to the present:
 - a. All engineering analysis, studies, and any other documents related to the use or consideration of the installation and/or use of DSI or a scrubber system.
 - b. All requests for proposals related to the feasibility, performance, cost, or installation of DSI or a scrubber system.
 - c. All feasibility studies and/or technical review documents related to DSI or a scrubber system.
 - d. All documents related to emissions reductions, operating costs, maintenance costs, or capital costs for DSI or a scrubber system.
 - e. All performance tests, CEMs data, or any other testing data that was collected during the use of any DSI or scrubber system.
 - f. All information related to the remaining useful life of Units 1 and 2.
2. Provide any studies, either internal or via contractor/consultant, that relate to any of the information in Question #1 above from March 2011 to the present.
3. Provide information describing how the sulfur content of any coals burned at Gerald Gentleman Station Units 1 and 2 is measured and reported to the Energy Information Agency (EIA), including any bases (wet or dry), standards followed, analyses techniques, sampling techniques, and sampling frequencies, etc. Provide any additional information necessary to interpret the sulfur content of the coal that is reported to the EIA.
4. For the Gerald Gentleman Station Units 1 and 2, provide all documents as described below from March 2011 to the present:

Please see documents at Bates range NPPDRH114_0000162 - NPPDRH114_0000891. Information in response to question 4 was identified and compiled by Mr. Russell D. Nyffeler, Mr. Jason Vanek, Mr. Brian Barels, and Mr. Terry Ackerman.

- a. All analyses, studies, and other documents related to water quantity availability, usage, requirements, and/or sources, to operate the Units, including but not limited to process water, cooling water, etc., and/or DSI or a scrubber system;
- b. All information related to the current water usage of the Units;
- c. All documents related to operating or capital costs associated with obtaining water, water offsets, and/or water rights to operate the Units and/or DSI or a scrubber system;
- d. All analyses, studies, and other documents related to potential effects on outside interests (other than NPPD's interests), including but not limited to, effects on agricultural interests, private interests, or endangered species, of obtaining water,

water offsets, and/or water rights to operate the units and/or DSI or a scrubber system.

5. Provide any studies, either internal or via contractor/consultant that relates to any of the information in Question #4 above from March 2011 to the present.

Please see documents at Bates range NPPDRH114_0000162 - NPPDRH114_0000891. Information in response to question 4 was identified and compiled by Mr. Russell D. Nyffeler, Mr. Jason Vanek, Mr. Brian Barels, and Mr. Terry Ackerman.